

## **EXHIBIT E**

## DECLARATION OF DUNCAN MALCOLM ARTHUR

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. My name is Duncan Malcolm Arthur. I am a citizen of the Republic of Ireland and the Republic of South Africa, although currently residing at an undisclosed location within the United Kingdom.
2. I am submitting this affidavit voluntarily and assert that the statements herein are true to the best of my knowledge.
3. I have reviewed this declaration with my lawyer, Dr. Jonathan Levy, and do not waive any rights or privilege except as to matters explicitly discussed herein.
4. My motivation is to provide clarity, furthermore assist the investors and creditors of OneCoin who have not received any monetary payment in restitution.
5. I am not affiliated with/to the Defendant and have no affinity with him nor stake in such outcome of his case.
6. I was employed by the now defunct English company RavenR, which was an affiliate of the OneCoin organization founded and controlled by Ruja Ignatova. One project I worked on at OneCoin was the creation of Dealshaker and NewDealShaker, which were online marketplaces for individuals to buy products with OneCoin from select merchants. Although Dealshaker still purports to operate under the control of Ruja Ignatova's proxies, it was never a complete project owing to the inchoate nature of OneCoin.
7. I was personally recruited by Ruja Ignatova. During the time that I worked for RavenR, I believed that OneCoin was a legitimate business venture and like so many others was also deceived by the trappings of a lavish and thriving 'fintech' financial technology venture, albeit a dysfunctional one, due to the antics of Ruja Ignatova and her inner circle. Before Ruja's disappearance, I rarely went to Sofia, Bulgaria. I never met anyone on the network marketing side until that point of her disappearance. In February 2017 I was told by a senior OneCoin executive that I was not to speak to Ruja directly. I subsequently learned that Ruja had developed a dislike for me and wanted me dismissed.
8. I have voluntarily cooperated with US authorities and the City of London Police with the OneCoin investigation and have spoken to investigators on several occasions beginning on 6<sup>th</sup> March 2019. During 6<sup>th</sup> March 2019 I was approached by two Special Agents of the United States Internal Revenue Service Criminal Investigation division at

the Los Angeles International Airport prior to departing the U.S. They stated that they wished to speak to me in consideration of my interactions with Konstantin Ignatov. I obliged and consented to speak with them voluntarily. I turned over documents relating to the organization of the US trip. I also consented to my passports being photographed.

9. During June 2021, I read the transcript of the trial of Mark Scott for the first time, which took place in the Southern District of New York. Prior to this, I did not know the full details of Ignatov's testimony. Although I had access to the documents, I did not feel inclined to read them. However, I had also read summaries produced on the Internet. None of those summaries concerned a laptop. I was frankly horrified that Ignatov had pleaded guilty, I have no interest in Mark Scott and I did not feel it necessary to engage hundreds of pages of documents relating to incidents of which I am ashamed of by association and personal disappointment.

10. It was apparent, Ignatov made some errors in his recollection but also he intentionally testified falsely about a OneCoin laptop, that contained voluminous operational records that he had in his possession when he was first approached by U.S. authorities when he entered the United States in or around late February 2019.

11. According to the trial transcript, Ignatov testified that his phone and computer were taken from him by an agent from border patrol when he arrived in the United States at the San Francisco airport. He then stated that the agent kept his phone and returned his computer to him. When asked what he did with his computer once it had been returned to him, he stated, "I threw it away," and specified that he "put it into a paper trash bag with other trash items, and took it to a trash bin on a busy place in the Las Vegas Strip, and threw it into the trash bin there". This was a fabrication and an intentionally untrue statement.

12. In reality, Ignatov either gave the laptop to me with instructions to deliver it to Bulgaria, or placed it in my onboard cabin luggage. Both had happened before. I cannot attest as to which it was. I accompanied Ignatov during this trip to the United States in late February 2019 in order to participate in meetings relating to Dealshaker, NewDealShaker.com and OneCoin. I returned the laptop to Sofia, Bulgaria to give it to Veska Ignatova, the mother of Konstantin Ignatov and Ruja Ignatova. I further read the indictments against Ignatov and Ignatova on 9<sup>th</sup> March 2019. I was now very concerned and asked the same questions I had been asked in Los Angeles without satisfactory answers. I asked questions of Veselina Valkova specifically around how the coin was valued as well as the functioning of the blockchain.

13. I took the laptop with me when I departed the United States via (LAX) Los Angeles International Airport on 6<sup>th</sup> March 2019, but I did not travel directly to Bulgaria,

I stopped firstly in Istanbul and then London. I discovered the laptop in my luggage in Istanbul. At that given time, I still held Konstantin to be a friend and believed him to be innocent.

14. Several other associates (not law enforcement), and I examined the laptop files on Konstantin Ignatov's laptop. This was done mostly out of curiosity. I did not have a charger for the laptop and the battery was depleting, was limited in having to travel to Sofia and did not really feel comfortable going through who I considered to be a friend's computer.

15. The computer was booted up and it was immediately noticeable it had no security password login requirement. It further automatically connected to the Internet. A quick check of the contents indicated that as expected it contained voluminous OneCoin operational files and a large number of photo files. Many of the operational files seemed familiar to me and were similar to the Dropbox files later turned over by myself from RavenR to law enforcement.

16. Satisfied that the laptop seemed to contain only OneCoin matters, I then travelled to Sofia without incident and handed the laptop to Veska Ignatova.

17. In June 2021, I advised [REDACTED] of the New York County District Attorney's Office that Ignatov had testified falsely about the laptop and that both U.K. and U.S. authorities should be aware of this.

18. I have never met or spoken with Mark Scott. However, I do know Ruja Ignatova and many others who have been unjustly financially enriched, remain at large.

19. The OneCoin laptop as well as the RavenR Dropbox files contained many details about OneCoin's financial dealings in London, Dubai, and Sofia, and the disposition of assets including bank accounts, investments, related business ventures, valuables and real estate in billions of dollars.

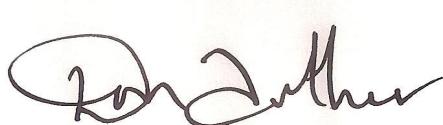
20. I am extremely concerned that those unjustly enriched have in fact profited and continue to profit at the expense of over a million investors and creditors worldwide.

21. I am frustrated and chagrined that there is no ongoing attempt by the US government to obtain restitution for victims and creditors, such as the appointment of a receiver to seek and recover assets from relief defendants, Ruja Ignatova and Sebastian Greenwood's proxies in Sofia and Dubai.

22. I have been subjected to numerous taunts and threats by persons who believe I have been unjustly enriched and am somehow responsible for their losses. There have been even more ominous threats from existing OneCoin functionaries who hold me responsible and referred to me as a 'traitor', 'rat' and 'devil'. Therefore, it is my wish and desire to provide evidence enabling clarity in reference to the laptop and its contents that I believe contain information that would result in restitution of OneCoin assets.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this the 30<sup>th</sup> day of September 2021.

A handwritten signature in black ink, appearing to read "Duncan Malcolm Arthur".

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DUNCAN MALCOLM ARTHUR